

# HISTORIC HAWAII FOUNDATION

May 12, 2009

Mr. Wayne Yoshioka, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawai'i 96813

**RE: Section 106 Consultation for the Honolulu High-Capacity Transit Corridor Project,  
Historic Resources Effects Determination for the Honolulu High-Capacity Transit Corridor  
Project**

Dear Mr. Yoshioka:

Thank you for referring the above-mentioned project to Historic Hawai'i Foundation for consultation under Section 106 of National Historic Preservation Act.

The Historic Resources Effects Determination for the Honolulu High-Capacity Transit Corridor Project takes into account the effect of the project to each historic resource and evaluates the effect to each aspect of the property's historic integrity. The report states that certain aspects of integrity were either more or less important based on the criterion under which the property was eligible and the extent to which that aspect of integrity has already been affected.

Four hundred ninety-nine properties constructed prior to 1968 were evaluated for eligibility for listing on the National Register of Historic Places. Seventy-four of them were determined to be eligible; additionally, nine are already listed on the historic register. The report should also acknowledge that there are two National Historic Landmarks (NHL) included in the area of potential effect: Pearl Harbor and CINCPAC Headquarters.

Twenty-two of the historic properties were found to be adversely effected by the project. The draft EIS determined an adverse effect would occur to only six of the eligible and listed properties. The technical report takes into account more of the visual effects that the transit corridor project will have to historic resources, such as historic bridges and the Chinatown district, which is listed on the National Register of Historic Places.

While we are pleased to see that some visual impacts on historic resources have been taken into account, we continue to feel that all visual impacts to historic resources have not been acknowledged. The most significant omission is the impact to the Pearl Harbor NHL. The report indicates that there will be no effect at all to the feeling or association of the district and that there is no adverse effect to the setting.

The project will be located on Kamehameha Highway 25 feet from the ma uka edge of the NHL boundary and it will be elevated 30-50 feet above grade. Additionally, the Aloha Stadium station and



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the Pearl Harbor Naval Base station would be adjacent to the NHL. The proximity and scale of the project will undoubtedly cause it to have an effect on the integrity of feeling and association due to the large visual intrusion occurring around and within the boundaries of the Pearl Harbor NHL.

Regarding Pearl Harbor's integrity of setting, the report states:

"Numerous other changes to the setting have not affected Pearl Harbor NHL's integrity of setting. These changes include the increasingly busy Kamehameha Highway, which has been widened in some areas; the installation of tall power transmission poles and lines that dwarf surrounding structures; and the large, nearby Aloha Stadium, built in 1975." (124).

HHF feels that this statement is not accurate. The above-mentioned changes to the setting of Pearl Harbor did adversely affect the setting, especially Kamehameha Highway; integrity of feeling and association has been affected as well. Further, the proposed 30-50 foot elevated transit line is more consequential than previous changes and will have an even greater adverse effect on the NHL. Appropriate steps should be taken to mitigate this impact.

While regarding Pearl Harbor NHL the report states that Kamehameha Highway has "not affected Pearl Harbor NHL's integrity of setting," the report draws a different conclusion whereas it concerns the CINCPAC headquarters, a separately listed NHL. This section of the report states:

"Tall power transmission poles (which are considerably higher than the guideway would be) and power lines are located along the roadway and are a substantial intrusion that is already present in the building's setting, as is the busy Kamehameha Highway" (140).

There is a discrepancy as to the impact that Kamehameha Highway already has to historic resources and the level to which the elevated guideway would impact the historic resources. For the NHL district, the report indicates that Kamehameha Highway did not impact Pearl Harbor's setting, but it indicates that it is a "substantial intrusion" on the setting of the CINCPAC headquarters building. HHF feels that the highway is a substantial intrusion to both CINCPAC and Pearl Harbor, and the elevated guideway would further intrude on the setting of both resources. As such, it should result in an adverse effect determination.

We also strongly suggest that you solicit comments from the NHL staff, as you state that they have not reviewed these determinations of eligibility or concurred with the implications of contributing/non-contributing status for resources within the Pearl Harbor NHL.

Additionally, we feel that further discussion is necessary regarding the effects to other historic properties, especially in the downtown area including: the Merchant Street Historic District; DOT Harbors Division; Pier 10/11; Walker Park; Irwin Park; and the Tong Fat Building tenements



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The reason given for the determination of no effect to the integrity of feeling for all of these properties is that “the Project would not affect any of the property’s physical features or further diminish the property’s expression of its historic character.” For the historic properties that front Nimitz Highway, their proximity to the rail line will impact their integrity of feeling whether or not the physical features of that property are impacted as their ability to visually convey their historic significance will be limited.

Irwin Park, for example, is was originally developed c. 1930 and is eligible under criterion A for its association with the history of beautification efforts in the Honolulu waterfront passenger terminal area; under criterion B for its association with William G. Irwin, and under criterion C for representing the work of leading Honolulu landscape architect Robert O. Thompson. The guideway would be 60-70 feet from Irwin Park and elevated 40 to 45 feet. As a designed landscape developed to aesthetically enhance the waterfront area, this visual intrusion on the park’s setting would cause an adverse effect.

The scale of the guideway will significantly impact the ability of these properties to convey their historic significance due to the impact that the guideway will have on their settings, regardless of whether or not there is any physical intrusion on the property.

Thank you for the opportunity to comment. We look forward to the opportunity to discuss the proposed project further.

Very truly yours,



Kiersten Faulkner, AICP  
Executive Director

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